

FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

vs.

JOSEAN DOMENECH-ROBLES,
Defendant.

CRIMINAL NO. 17-498 (JAG)

MOTION REQUESTING ORDER FOR PRODUCTION OF *GIGLIO* AND *JENKS*

Josean Domenech-Robles (“Mr. Domenech-Robles”) represented by the Federal Public Defender for the District of Puerto Rico through the undersigned attorney, respectfully states and requests as follows:

Mr. Domenech-Robles is scheduled to begin trial on July 23, 2018. Mr. Domenech-Robles requests that the Court enter an Order requiring the government to provide any *Giglio* and *Jenks* material, to defense counsel, by July 19, 2018. Early production of the requested material will allow Mr. Domenech-Robles and counsel sufficient time to review any documents prior to the trial thereby promoting judicial economy and avoiding any unnecessary delays.

I HEREBY CERTIFY that on this date I electronically filed the present notice with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the parties of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, July 17, 2018

ERIC A. VOS, ESQ.

Federal Public Defender

District of Puerto Rico

S/JUAN J. MICHELEN

Assistant Federal Public Defender,

USDC-PR G02601

241 F.D. Roosevelt Avenue

San Juan, PR 00918-2305

Phone No. (787) 281-4922

[Juan Michelen@fd.org](mailto:Juan_Michelen@fd.org)